


# THE HARMAN FIRM, LLP

Attorneys & Counselors At Law  
www.theharmanfirm.com

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 8/24/2017

## VIA ECF

Hon. Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

The Clerk of Court is respectfully directed to update the address for Ms. Johanny Trejo, the pro se Defendant, with the address listed on Plaintiffs' letter, and to mail a copy of this endorsement to the pro se Defendant. Defendant Trejo is further instructed to provide a notice of change of address that includes a current telephone number and email address by no later than September 4, 2017. A notice of change of address for pro se litigants can be found at the Court's website (<http://www.nysd.uscourts.gov/forms.php>). Defendants are also reminded that it is their obligation to notify the Court if their addresses change.

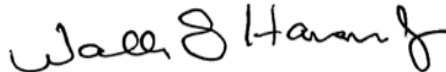
**Re: *De La Cruz v. Trejo Liquors, Inc.* 16-cv-4382**

Dear Judge Broderick:

We represent Plaintiffs Paulino De La Cruz and Juventino Ramos in the above-referenced action. On August 22, 2017, in compliance with Your Honor's August 18, 2017 Order [Docket No. 61], Plaintiffs' Counsel sent Defendant Johanny Trejo the attached to alert her of the Court's deadline to submit a case management plan and to schedule a time to meet and confer. We now write to respectfully request that Defendants' former counsel, Argilio Rodriguez, Esq. docket Defendant Johanny Trejo's home address, telephone number and email address so that the parties may communicate more easily with each other in the future.

Thank you for Your Honor's time and attention to this matter.

Respectfully submitted,



Walker G. Harman, Jr.

Enclosure

cc: Trejo Liquors, Inc. and Johanny Trejo (via certified mail)  
948 Amsterdam Avenue  
New York, NY 10025

# Exhibit A

# THE HARMAN FIRM, LLP

Attorneys & Counselors At Law

[www.theharmanfirm.com](http://www.theharmanfirm.com)

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August 22, 2017

**VIA REGULAR MAIL**

Johanny Trejo  
Trejo Liquors Inc.  
948 Amsterdam Avenue  
New York, NY 10025

**Re: *De la Cruz v. Trejo Liquors, Inc.*, 16 CV 4382**

Dear Ms. Trejo,

As you know, we represent Plaintiffs Paulino De la Cruz and Juventino Ramos in the above-referenced action. In accordance with the Court's August 18, 2017 Order, we must meet and confer and submit a proposed case management plan by September 15, 2017. Therefore, please contact us at (212) 425-2600 to schedule an in person or telephone.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Walker G. Harman, Jr.", is written over the typed name.

Walker G. Harman, Jr.

Enclosure

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220 Fifth Avenue, Suite 900  
New York, New York 10001  
T 212 425 2600 F 212 202 3926



Jennifer Melendez <jmelendez@theharmanfirm.com>

## Activity in Case 1:16-cv-04382-VSB De La Cruz et al v. Trejo Liquors, Inc. et al Order on Motion for Conference

NYSD\_ECF\_Pool@nysd.uscourts.gov <NYSD\_ECF\_Pool@nysd.uscourts.gov>

Mon, Aug 14, 2017 at 3:22 PM

To: CourtMail@nysd.uscourts.gov

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

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U.S. District Court

Southern District of New York

### Notice of Electronic Filing

The following transaction was entered on 8/14/2017 at 3:22 PM EDT and filed on 8/14/2017

**Case Name:** De La Cruz et al v. Trejo Liquors, Inc. et al

**Case Number:** 1:16-cv-04382-VSB

**Filer:**

**Document Number:** 61

#### Docket Text:

**ORDER terminating [60] Letter Motion for Conference re: [60] LETTER MOTION for Conference addressed to Judge Vernon S. Broderick from Walker G. Harman, Jr. dated August 10, 2017. Plaintiffs and the remaining individual Defendant, Ms. Trejo, are directed to meet and confer and submit a proposed case management plan by September 15. If Plaintiffs wish to seek a certificate of default against Defendant Trejo Liquors, Inc. for failure to retain counsel, (see Doc. 56), they are directed to do so by September 15 in accordance with Rule 4.H. and Attachment A of my Individual Rules. SO ORDERED. (Signed by Judge Vernon S. Broderick on 8/14/2017) (rj)**

**1:16-cv-04382-VSB Notice has been electronically mailed to:**

Walker Green Harman, Jr [wharman@theharmanfirm.com](mailto:wharman@theharmanfirm.com), [h.paige@theharmanfirm.com](mailto:h.paige@theharmanfirm.com), [jmelendez@theharmanfirm.com](mailto:jmelendez@theharmanfirm.com), [lcraig@theharmanfirm.com](mailto:lcraig@theharmanfirm.com)

Edgar Mikel Rivera [erivera@theharmanfirm.com](mailto:erivera@theharmanfirm.com)

**1:16-cv-04382-VSB Notice has been delivered by other means to:**

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1008691343 [Date=8/14/2017] [FileNumber=18759332-0] [5def1ea5ee1862c7d98e0ab6eeee88552ee43aab22f7202113e9c8522a6309da3f7127a48165e392ecf59cc49b5bac58db13e3def8a36ec0804f3429e2c130f1]]